

Exhibit 1



U.S. Department of Justice
Civil Division
Office of International Judicial Assistance

KMStanford:lkj

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July 1, 2024

BY EMAIL

Dennis Barghaan, Civil Chief
United States Attorney's Office
Eastern District of Virginia
2100 Jamieson Ave
Alexandria, VA 22314

Re: Request for International Judicial Assistance from the 10th Family Court of
Anadolu in Istanbul in Istanbul, Republic Türkiye in Ahmed M. Bedier v. Aslihan
Bedier, Ref No. 2022/480
DJ Reference Number: 189-25-24-38

Dear Mr. Barghaan:

The Office of International Judicial Assistance, within the Civil Division, serves as the U.S. Central Authority for the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters ("Hague Evidence Convention"). 28 C.F.R. § 0.49. Pursuant to that Convention, we have received the above-captioned Letter of Request seeking evidence in a civil matter pending in the Republic of Türkiye. We are referring this Request to you for handling. See United States Attorney Manual, § 4-1.325. Within fifteen days, please provide us with contact information for the individual assigned to handle this matter.

In its Request, the Turkish Court requested we obtain evidence in the form of testimony from Mongi Dhaouadi, a witness located in Alexandria, Virginia. Please see enclosures for the list of questions to be asked of the witness.

Please note our office has been actively trying to execute this case as it is still needed by the Turkish Court. Mr. Dhaouadi initially responded to a phone call from OIJA on February 14, 2024, and indicated that he would respond voluntarily via email. Mr. Dhaouadi never responded to three Execution Packages that were sent by OIJA via email (see enclosed). Our office tried to reach the witness again by phone after the third email attempt, but he did not call back upon receipt of a phone call and voicemail. We then sent packages via FedEx to both recent addresses for Mr. Dhaouadi listed in a public records search. Mr. Dhaouadi signed for the package sent to Alexandria, Virginia, on May 24, 2024. **Therefore, we advise that you proceed directly to the 28 U.S.C. § 1782 process and compel Mongi Dhaouadi to provide the evidence requested. If possible, please require that the witness provides written responses to the interrogatories to avoid incurring court reporter costs.**

Mr. Dhaouadi resides at the following address: 614 N. Ripley St., Alexandria, VA 22304. His phone number is 860-514-8038 and email is mongi25d@gmail.com.

There are instructions and frequently asked questions for the execution of Letters of Request on our website at: <http://dojnet.doi.gov/civil/ofl/index.html>. We urge you to review all of these materials before executing this referral. Before issuing a subpoena to compel testimony, we encourage you to contact the witness, advise her of the nature of the request, and ascertain whether she will agree to furnish the responses voluntarily. In the absence of voluntary compliance, the testimony can be compelled by your office pursuant to 28 U.S.C. § 1782. **If your office will incur an expense for which you intend to seek reimbursement from the Requesting Authority, you must inform our office before you incur the expense so we can seek assurance from the Requesting Authority to proceed. Failure to do so may result in the Requesting Authority's refusal to reimburse your office for the expense.**

Article 9 of the Hague Evidence Convention requires that requests for evidence be executed "expeditiously." Accordingly, we urge that your office handle this matter as quickly as possible. Given the increasing number of evidence requests that United States litigants send abroad[pursuant to the Hague Evidence Convention, often with short discovery deadlines, expeditious handling of evidence requests by the United States may, as a matter of reciprocity, encourage similar treatment by foreign authorities. We anticipate this Request can be completed within ninety days. If additional time is needed to complete the Request, please provide us a status report by the ninetieth day and every two weeks thereafter.

After you have executed this Request, please return all documents sent with the Request and any original documents obtained through the execution of this Request to us so that we may return them to the foreign court. We would also appreciate receiving copies of any pleadings or motions that have been filed by your office in this case.

If you have any questions, please contact us at OIJA@usdoj.gov or 202-514-6700.

Thank you in advance for your cooperation and assistance in this matter.

Very truly yours,

A handwritten signature in blue ink that reads "Krysta M. Stanford". The signature is fluid and cursive, with the first name "Krysta" being more prominent.

KRYSTA M. STANFORD
Trial Attorney

Enclosures